Mr. Paul Fathauer
Allomatic Products Company
P. O. Box 267
Sullivan, Indiana 47882

Re: 153-13814-00015
First Administrative Amendment to
Part 70153-12504-00015

Dear Mr. Fathauer:

Allomatic Products Company was issued a permit on November 2, 2000 for a stationary plant that manufactures automotive clutch plates and transmission parts. A letter requesting to move the permitted opposed disk grinders, RM1012 and RM1013, from stack S14 (dust collector RM1011) to stack S6 (dust collector M2024), and re-identifying RM1012 to M2048 and RM1013 to M2049 was received on January 22, 20001. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (changes are bolded and deletions are struck-through for emphasis):

1. A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary **plant** that manufactures automotive clutch plates and transmission parts.

(a) Proposed New Construction:

(1) One (1) adhesive coating line, to be identified as RM2002, which is capable of coating 300 torque rings per hour. The adhesive will be applied through a curtain coater. The VOC and HAP emissions will be controlled by a new 1.0 million British Thermal per hour (mmBtu/hr) catalytic oxidizer (S/V- ID S10).

(b) The source consists of the following permitted emission units and pollution control devices:

(1) No changes

(2) No changes

(3) No changes

(4) Two (2) OD sanders, identified as M2010.1 and M2010.2 capable of sanding a total of 11,400 bonded assemblies per hour; **and two (2) opposed disk grinders**, **identified as M2048 and M2049** ~~RM1012 and RM1013~~ **capable of grinding a total of 19,000 friction assemblies per hour**. The particulate matter (PM) emissions from these sanders **and grinders** are controlled by baghouse **M2024** (**stack** SV- ID S6).

~~(5) Two (2) opposed disk grinders, identified as RM1012 and RM1013 capable of grinding a total of 19,000 friction assemblies per hour. The PM emission is controlled by baghouse (SV- ID S14).~~

2. Section D.1 is revised as follows:

Facility Description [326 IAC 2-8-4(10)]:

(b) Proposed New Construction:

(1) One (1) adhesive coating line, to be identified as RM2002, which is capable of coating 300 torque rings per hour. The adhesive will be applied through roll coater. The VOC and HAP emissions will be controlled by a new 1.0 million British Thermal per hour (mmBtu/hr) catalytic oxidizer (S/V- ID S10).

(b) The source consists of the following permitted emission units and pollution control devices:

(1) One (1) natural gas-fired space heater, ID5 with a heat input capacity of 16 million British Thermal Units per hour (mmBtu/hr);

(2) Two (2) etching lines M2002 and M2027, which are capable of etching a total of 10,200 steel plates per hour, and have a maximum usage of 4 pounds of acid per hour. The particulate matter emissions from these facilities are controlled by a packed tower scrubber (S/V -ID S1);

(3) Two (2) adhesive coating lines identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. The volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions are controlled by a 1.5 mmBtu/hr catalytic oxidizer (S/V -ID S2);

(4) Two (2) OD sanders, identified as M2010.1 and M2010.2 capable of sanding a total of 11,400 bonded assemblies per hour; **and two (2) opposed disk grinders**, **identified as M2048 and M2049** ~~RM1012 and RM1013~~ **capable of grinding a total of 19,000 friction assemblies per hour**. The particulate matter (PM) emissions from these sanders **and grinders** are controlled by baghouse **M2024** (**stack** SV- ID S~~14~~ **6**); and

~~(5) Two (2) opposed disk grinders, identified as RM1012 and RM1013 capable of grinding a total of 19,000 friction assemblies per hour. The PM emission is controlled by baghouse (SV- ID S14).~~

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

In re-directing the PM emissions from the grinders to the sanders' baghouse the PM10 emission limit for the grinders and sanders is combined into one limit. This is also true with the PM emissions. Revision is as follows:

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter Less Than Ten Microns (PM10) [326 IAC 2-8]

The PM10 emissions from the following facilities shall be limited as follows:

Process/facility	PM10 Emissions (lbs/hr)

Etching Lines M2002 & M2027 **(packed tower scrubber, S/V-ID S1)**	0.45
Opposed Disk Grinders ~~RM1012~~ **2048** & ~~RM1013~~ **2049**, OD Sanders M2010.1 & M2010.2 **(baghouse M2024)**	~~11.8~~ **21.2**
~~OD Sanders M2010.1 & M2010.2~~	~~9.4~~

Compliance with these limits shall make 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

This rule mandates a PM emissions limit using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Facility/Process	Process Weight Rate (tons/hr)	PM Limit (lb/hr)
Acid Etching, M2002 & M2027	0.51	2.6
Opposed Disk Grinders ~~RM1012~~ **2048** & ~~RM1013~~ **2049**, OD Sanders M2010.1 & M2010.2 **(baghouse M2024)**	~~0.57~~ **1.52**	~~2.8~~ **5.42**
~~Opposed Disk Grinders, RM1012 & RM1013~~	~~0.95~~	~~3.96~~

D.1.3 to D.1.7 No changes

D.1.8 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) No changes
(b) No changes

(c) The Permittee shall perform PM-10 testing on baghouse M2024 ~~the~~ for the Opposed Disk Grinders, ~~RM1012~~ **2048** & ~~RM1013~~ **2049 and OD Sanders M2010.1 and M2010.2** utilizing Methods 201 or 201A and 202 (40 CFR 51, Appendix M), or other methods as approved by the Commissioner. PM-10 includes filterable and condensible PM-10.

(d) No changes

D.1.9 No changes

D.1.10 No changes

D.1.11 Visible Emissions Notations

(a) Daily visible emission notations of ~~the~~ baghouse **M2024 (**SV- ID S~~14~~ **6** stack exhaust**)** shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.12 Pressure Drop Monitoring

The Permittee shall record the total static pressure drop across baghouse **M2024 (**SV- ID S~~14~~ **6)** used in conjunction with the Opposed Disk Grinders (~~RM1012~~ **2048** & ~~RM1013~~ **2049**), **and OD Sanders (M2010.1 & M2010.2)** ~~disk grinders~~, ~~identified as RM1012 and RM1013,~~ at least once weekly when any of the disk grinders **and sanders** is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 2.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.13 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the Opposed Disk Grinders (~~RM1012~~ **2048** & ~~RM1013~~ **2049**), and OD Sanders **(**M2010.1 & M2010.2**)** when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents

to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.14 Record Keeping Requirements

(a) To document compliance with Conditions D.1.3, D.1.4 and D.1.5 the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.3, D.1.4 and D.1.5.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC and HAP usage for each month; and

(5) The weight of VOCs and HAPs emitted for each compliance period.

(6) The continuous temperature records for the catalytic oxidizers and the temperature used to demonstrate compliance during the most recent compliance stack test.

(7) Weekly records of the duct pressure or fan amperage.

(b) To document compliance with Condition D.1.11, the Permittee shall maintain records of daily visible emission notations of the disk grinders ~~R~~ M~~1012~~ **2048** and ~~R~~ M~~1013~~ **2049**) **and OD Sanders (M2010.1 and M2010.2**) baghouse **M2024 (**SV- ID S~~14~~ **6** stack exhaust**)**.

2. Indiana Department of Environmental Management, Office of Air Management has been changed to Indiana Department of Environmental Management, Office of Air Quality.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: File - Sullivan County
U.S. EPA, Region V
Sullivan County Health Department
Air Compliance Section Inspector - Marc Goldman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) and NEW SOURCE REVIEW

OFFICE OF AIR QUALITY

Allomatic Products Company
609 East Chaney Street
Sullivan, Indiana 47882

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: NSR/FESOP 153-12504-00015	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: November 2, 2000
1st Administrative Amendment No.: 153-13814	Affected Pages: 4, 5, 26, 27, 28, 29, 30
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary plant that manufactures automotive clutch plates and transmission parts.

Authorized individual:	Robert Clark
Source Address:	609 East Chaney Street, Sullivan, Indiana 47882
Mailing Address:	609 East Chaney Street, P. O. Box 267, Sullivan, Indiana 47882
Phone Number:	(812) 268-0322
SIC Code:	3714
County:	Sullivan
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Proposed New Construction:

(1) One (1) adhesive coating line, to be identified as RM2002, which is capable of coating 300 torque rings per hour. The adhesive will be applied through a curtain coater. The VOC and HAP emissions will be controlled by a new 1.0 million British Thermal per hour (mmBtu/hr) catalytic oxidizer (S/V- ID S10).

(b) The source consists of the following permitted emission units and pollution control devices:

(1) Various natural gas-fired space heater, ID5 with a maximum total heat input capacity of 16 million British Thermal Units per hour (mmBtu/hr);

(2) Two (2) etching lines M2002 and M2027, which are capable of etching a total of 10,200 steel plates per hour, and have a maximum usage of 4 pounds of acid per hour. The particulate matter emissions from these facilities are controlled by a packed tower scrubber (S/V -ID S1);

(3) Two (2) adhesive coating lines identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. The volatile organic compounds (VOC) and hazardous air

pollutant (HAP) emissions are controlled by a 1.5 mmBtu/hr catalytic oxidizer (S/V -ID S2);

(4) Two (2) OD sanders, identified as M2010.1 and M2010.2 capable of sanding a total of 11,400 bonded assemblies per hour; and two (2) opposed disk grinders, identified as M2048 and M2049 capable of grinding a total of 19,000 friction assemblies per hour. The particulate matter (PM) emissions from these sanders and grinders are controlled by baghouse M2024 (stack SV- ID S6).

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Various natural gas-fired heaters, burners/ovens, including the incinerators with a total heat input capacity of 6.5 mmBtu/hr.

(b) Combustion source flame safety purging on startup.

(c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

(e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(h) Cleaners and solvents characterized as follows:
(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100^{o}F) or;
(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68^{0}F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(j) Closed loop heating and cooling systems.

(k) Activities associated with the treatment of wastewater streams with an oil and greases content less than or equal to 1% by volume.

(l) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) Proposed New Construction:

(1) One (1) adhesive coating line, to be identified as RM2002, which is capable of coating 300 torque rings per hour. The adhesive will be applied through roll coater. The VOC and HAP emissions will be controlled by a new 1.0 million British Thermal per hour (mmBtu/hr) catalytic oxidizer (S/V- ID S10).

(b) The source consists of the following permitted emission units and pollution control devices:

(1) One (1) natural gas-fired space heater, ID5 with a heat input capacity of 16 million British Thermal Units per hour (mmBtu/hr);

(2) Two (2) etching lines M2002 and M2027, which are capable of etching a total of 10,200 steel plates per hour, and have a maximum usage of 4 pounds of acid per hour. The particulate matter emissions from these facilities are controlled by a packed tower scrubber (S/V -ID S1);

(3) Two (2) adhesive coating lines identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. The volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions are controlled by a 1.5 mmBtu/hr catalytic oxidizer (S/V -ID S2);

(4) Two (2) OD sanders, identified as M2010.1 and M2010.2 capable of sanding a total of 11,400 bonded assemblies per hour; and two (2) opposed disk grinders, identified as M2048 and M2049 capable of grinding a total of 19,000 friction assemblies per hour. The particulate matter (PM) emissions from these sanders and grinders are controlled by baghouse M2024 (stack SV- ID S6).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter Less Than Ten Microns (PM10) [326 IAC 2-8]

The PM10 emissions from the following facilities shall be limited as follows:

Process/facility	PM10 Emissions (lbs/hr)
Etching Lines M2002 & M2027 (packed tower scrubber, S/V-ID S1)	0.45
Opposed Disk Grinders 2048 & 2049, OD Sanders M2010.1 & M2010.2 (baghouse M2024)	21.2

Compliance with these limits shall make 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

This rule mandates a PM emissions limit using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand

(60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Facility/Process	Process Weight Rate (tons/hr)	PM Limit (lb/hr)
Acid Etching, M2002 & M2027 (packed tower scrubber, S/V-ID S1)	0.51	2.6
Opposed Disk Grinders 2048 & OD Sanders M2010.1 & M2010.2 (baghouse M2024)	1.52	5.42

D.1.3 Volatile Organic Compounds (VOC) Emissions Limitations

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) emissions from the application of adhesive to torque rings and steel plates shall be limited to 3.0 pounds of VOCs per gallon of coating less water, for any calender day, for all other types of coatings.

(b) Pursuant to 326 IAC 8-1-2(c), the owner or operator is required to operate the new adhesive coating line, RM2002 catalytic oxidizer (S/V- ID S10) at an overall control efficiency of 79% and the VOC content of the adhesives shall not exceed 5.36 pounds per gallon of coating solids delivered to the applicator.

(a) Pursuant to 326 IAC 8-1-2(c), the owner or operator is required to operate the two (2) existing adhesive coating lines, M2003 and M2028 catalytic oxidizer (S/V- ID S2) at an overall control efficiency of 85% and the VOC content of the adhesives shall not exceed 5.0 pounds per gallon of coating solids delivered to the applicator.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.4 Volatile Organic Compounds (VOC)

Any change or modification which may increase the potential VOC emissions to 100 tons per year or more from the equipment covered in this permit must be approved by the Office of Air Quality (OAQ) before such change may occur.

D.1.5 Hazardous Air Pollutants Limitations

(a) The single HAP input usage (before the catalytic oxidizers) from all the emission points, including insignificant activities shall be limited to 43 tons per twelve month period, rolled on a monthly basis.

(b) Any change or modification which may increase the combined HAPs potential emissions to 25 tons per year or more from the equipment covered in this permit must be approved by the Office of Air Quality (OAQ) before such change may occur.

Compliance with (a) and (b) of this Condition and Condition D.1.10 will make 326 IAC 2-7 Part 70 Operating Permit not applicable.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.7 Catalytic Oxidizers (S/V- ID S10, S/V -ID S2)

Pursuant to 326 IAC 8-1-2 (VOC Compliance Methods), the VOC emissions from the proposed new adhesive coating line (RM2002) and the VOC emissions from the existing two coating lines (M2003 and M2028) shall be vented to each dedicated catalytic oxidizer for destruction in order to comply with the limit of 3.0 pounds per gallon less water as required in Condition D.1.2 of this permit.

D.1.8 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) Compliance stack tests shall be performed for the new adhesive coating line's catalytic oxidizer (S/V -ID S10) within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. Compliance stack tests shall be performed, to establish the operating temperature, fan amperage, and duct velocity that will corresponds to the required minimum overall control efficiency of 79% in 326 IAC 8-1-2(c). The stack tests shall be performed utilizing Method 25 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner.

(b) Compliance stack tests shall be performed for the two (2) adhesive coating lines identified as M2003 and M2028 Catalytic Oxidizer S/V - ID S14 after five (5) years from the initial tests conducted on July 2, 1999. Compliance stack tests shall be performed, to establish the operating temperature, fan amperage, and duct velocity that will corresponds to the required minimum overall control efficiency of 85% % in 326 IAC 8-1-2(c). The stack tests shall be performed utilizing Method 25 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner.

(c) The Permittee shall perform PM-10 testing on baghouse M2024 for the Opposed Disk Grinders, 2048 & 2049 and OD Sanders M2010.1 and M2010.2 utilizing Methods 201 or 201A and 202 (40 CFR 51, Appendix M), or other methods as approved by the Commissioner. PM-10 includes filterable and condensible PM-10.

(d) The tests shall be repeated at least once every five (5) years from the date of the valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.9 Capture System

The volatile organic compound (VOC) capture system for the adhesive lines RM2002, M2003 and M2028 shall meet the following criteria of a permanent total enclosure. Permanent total enclosure is defined - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device:

(a) Any NDO shall be at least four (4) equivalent opening diameters from each VOC emitting

point. Natural Draft Opening (NDO) is any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.

(b) The total area of all NDO's shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor, and ceiling.

(c) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air through all NDO's shall be into the enclosure.

(d) All access doors and windows whose areas are not included in condition (b) and are not included in the calculation in condition (c) shall be closed during routine operation of the process.

(e) All VOC emissions must be captured and contained for discharged through a control device.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.10 Catalytic Oxidizer Operating Parameters

(a) The new Catalytic Oxidizer S/V- ID S10 and existing Catalytic Oxidizer S/V- ID S2 shall be in operation at all times the respective adhesive coating line is in operation.

(b) When operating, the new Catalytic Oxidizer, S/V- ID S10 shall be operated at a minimum operating temperature of 600 ^{0}F or a minimum operating temperature, duct velocity or fan amperage established during the compliance stack tests that will correspond to the overall control efficiency of 79%, required by rule 326 IAC 8-1-2(c), necessary to achieve the limit of 3.0 pounds of VOC per gallon of coating less water in rule 326 IAC 8-2-9.

(c) When operating, the existing Catalytic Oxidizer, S/V- ID S2 shall be operated at a minimum operating temperature of 650 ^{0}F or a minimum operating temperature, duct velocity or fan amperage established during the compliance stack tests that will correspond to the overall control efficiency of 85%, required by rule 326 IAC 8-1-2(c), necessary to achieve the limit of 3.0 pounds of VOC per gallon of coating less water in rule 326 IAC 8-2-9.

D.1.11 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse M2024 (SV- ID S6) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.12 Pressure Drop Monitoring

The Permittee shall record the total static pressure drop across baghouse M2024 (SV- ID S6) used in conjunction with the Opposed Disk Grinders (2048 & 2049), and OD Sanders (M2010.1 & M2010.2), at least once weekly when any of the disk grinders and sanders is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 2.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.13 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the Opposed Disk Grinders (M2048 & M2049), and OD Sanders (M2010.1 & M2010.2) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.14 Record Keeping Requirements

(a) To document compliance with Conditions D.1.3, D.1.4 and D.1.5 the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.3, D.1.4 and D.1.5.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC and HAP usage for each month; and

(5) The weight of VOCs and HAPs emitted for each compliance period.

(6) The continuous temperature records for the catalytic oxidizers and the temperature used to demonstrate compliance during the most recent compliance stack test.

(7) Weekly records of the duct pressure or fan amperage.

(b) To document compliance with Condition D.1.11, the Permittee shall maintain records of daily visible emission notations of the disk grinders, M2048 and M2049 and OD Sanders, M2010.1 and M2010.2 baghouse M2024 (SV- ID S6 stack exhaust).

(c) To document compliance with Condition D.1.12, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event .

(3) Operation and preventive maintenance logs, including work purchases orders,